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PROTON MANAGEMENT LTD.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG;  
ILIOS CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
VASONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**DECLARATION OF ADAM TRIGG  
IN SUPPORT OF APPLICATION  
FOR LEAVE TO FILE UNDER  
SEAL DEFENDANT PROTON  
MANAGEMENT LTD.'S MOTION  
TO COMPEL ARBITRATION**

Date: June 13, 2025

Time: 9:00 a.m.

Place: Courtroom 6A, 6th Fl.

Judge: Hon. M. Williams Court

Am. Compl. Filed: Jan. 27, 2025

**DECLARATION OF ADAM C. TRIGG**

I, Adam C. Trigg, declare as follows:

1. I am a Partner with the law firm Bergeson LLP. I represent Defendant Proton Management Ltd. (“Proton”) in this matter. I submit this Declaration in connection with the Application for Leave to File Under Seal Exhibits to the Declaration of Adam C. Trigg in Support of Its Opposition to Swan’s ex parte application for Temporary Restraining Order (“Opposition”). Unless stated otherwise, this Declaration is based on my personal knowledge.

2. Proton seeks to redact narrow portions of its Memorandum of Points and Authorities and the Declaration of San Naidoo in Support of Proton’s Opposition, which include confidential and proprietary information related to Proton’s assets and operations.

3. Compelling reasons exists to seal portions of the *Ex Parte* Application and Corresponding Exhibits. Here, Proton seeks limited redaction of highly confidential information regarding Proton’s assets and operations.

4. Proton would suffer harm if its confidential and proprietary information relating to its business assets were disclosed to the public.

5. Proton has narrowly tailored its sealing so as to only redact what is necessary. Furthermore, the public does not have a countervailing interest in this information.

6. I declare under penalty of perjury under the laws of the United States of America that to the best of my understanding the foregoing is true and correct.

Dated: June 12, 2025

By: /s/ Adam C. Trigg  
Adam C. Trigg